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October 7, 2020

VIA ECF
Hon. John G. Koeltl
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: Phoenix Bulk Carriers (BVI) LTD. v. Trorient LLC
1:20-cv-00936-JGK
Application for Authorization to Serve Writs of Execution

Dear Judge Koeltl,

We represent the petitioner Phoenix Bulk Carriers in the captioned action which involved an action for entry of judgment on an arbitral award issued in New York. We write to make application for leave to serve writs of execution in lieu of the Marshal.

In July 2020, the Court entered an order confirming the award, and the Clerk subsequently entered judgment on July 28, 2020 in the sum of \$ 538,442.03 against the defendant. (*See* DKT # 14.) More than thirty (30) days have passed since entry and the judgment remains unsatisfied.

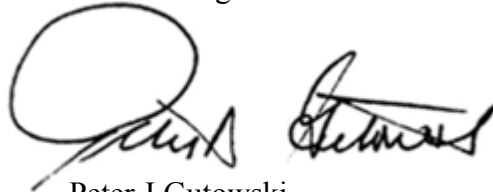
We have applied to the U.S. Marshal to serve writs of attachment on several banks located in New York, but have now been advised that they are not making any service

whatsoever, and cannot assist. Under these circumstances and pursuant to FRCP 4.1(a), we make application for leave to allow any attorney, paralegal or agent of Freehill Hogan & Mahar to serve writs of attachment in this action to avoid any delay in collection of the sums due.

We appreciate the Court's attention to the foregoing.

Respectfully submitted

Freehill Hogan & Mahar LLP



Peter J Gutowski

VIA ECF